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Attorney for Defendant  
UNITED HEALTHCARE SERVICES, INC.

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

JENNIFER ROLLINS,

Plaintiff,

v.

UNITED HEALTHCARE SERVICES,  
INC. dba UNITED HEALTH GROUP;  
and DOES 1 through 50, inclusive,

Defendants.

Case No. 21-cv-01023-TLN-DMC

**JOINT STIPULATION TO  
MODIFY PRE-TRIAL  
SCHEDULING ORDER;  
PROPOSED ORDER THEREON**

Judge: Hon. Troy L. Nunley  
Courtroom: 2

Magistrate: Hon. Dennis M. Cota

Complaint Filed: May 4, 2021

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**TO THE HONORABLE COURT:**

**WHEREAS** the Court issued an Initial Pretrial Scheduling Order on June 9, 2021 (Docket No. 4) (the “Scheduling Order”).

**WHEREAS** Defendant UNITED HEALTHCARE SERVICES, INC. (“Defendant”) filed a Motion to Compel Arbitration on August 5, 2021 (Docket No. 5).

**WHEREAS** the Motion to Compel Arbitration was fully briefed on September 9, 2021, and is currently under submission.

**NOW THEREFORE** Defendant and Plaintiff JENNIFER ROLLINS (“Plaintiff”, collectively with Defendant, the “Parties”) jointly move for a one hundred twenty day continuance of the dates set in the Court’s June 9, 2021 Initial Pretrial Scheduling Order (Docket No. 4). Good cause supports this request as the Parties are still awaiting a ruling on Defendant’s Motion to Compel Arbitration (Docket No. 5)

The Parties therefore jointly move to modify the Scheduling Order as follows:

EVENT	CURRENT DEADLINE	JOINTLY REQUESTED DATE
Non-Expert Discovery Cut off	February 3, 2022	June 3, 2022
Initial Expert Disclosures	April 4, 2022	August 2, 2022
Rebuttal Expert Disclosures	May 4, 2022	September 1, 2022
Supplemental Discovery	July 1, 2022	October 28, 2022
Last Day to file Dispositive Motions	August 2, 2022	November 30, 2022

Dated: January 5, 2022 **LAW OFFICES OF LARRY L. BAUMBACH**

By: /s/ Larry L. Baumbach (as authorized on 01/05/22)  
LARRY L. BAUMBACH

**LAW OFFICE OF JENNIFER L. NEWKIRK**  
JENNIFER L. NEWKIRK

Attorneys for Plaintiff  
JENNIFER ROLLINS

JOINT STIPULATION TO MODIFY PRE-TRIAL SCHEDULING ORDER;  
ORDER THEREON

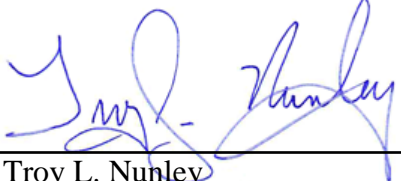
1 Dated: January 5, 2022 **WILSON TURNER KOSMO LLP**

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3 By: /s/ Marissa L. Lyftogt  
4 MARISSA L. LYFTOGT  
5 Attorney for Defendant  
6 UNITED HEALTHCARE SERVICES, INC.

7 **ORDER**

8 **IT IS HEREBY ORDERED** that all dates set forth in the Court's June 9, 2021  
9 Initial Pretrial Scheduling Order (Docket No. 4) are continued for one hundred  
10 twenty-days as presented in the Parties' Joint Stipulation to Modify Pre-Trial  
11 Scheduling Order.

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13 Dated: January 5, 2022

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15 Troy L. Nunley  
16 United States District Judge  
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